EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → NJD002324903

NEW JERSEY RIVET CO.
1785 HADDON AVE.
CAMDEN NJ 08103

INSTALLATION ADDRESS → 1785 HADDON AVE.
CAMDEN NJ 08103

EPA Form 8700-12B (4-80) 10/09/80

Please print or type with ELITE

Form Approved OMB No. 158-S79018
GSA No. 0246-EPA-OT

EPA NOTIF

FROM
NJD002324903
NEW JERSEY RIVET CO
1785 HADDON AVE
CAMDEN, NJ 08103

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F NJD002324903 T/A 31 C

APPROVED:

DATE RECEIVED (yr., mo., & day): 800818

I. NAME OF INSTALLATION

NEW JERSEY RIVET CO.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 1785 HADDON AVE.

CITY OR TOWN: 4 CAMDEN

ST.: NJ

ZIP CODE: 08103

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 1785 HADDON AVE.

CITY OR TOWN: 6 CAMDEN

ST.: NJ

ZIP CODE: 08103

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 VAN NAME, DENNIS PARTNER

PHONE NO. *(area code & no.)*: 609-963-2237

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 NEW JERSEY RIVET CO.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	N	J	D	0	0	2	3	2	4	9	0	3	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F006					
7	8	9	10	11	12

DETACH

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

DETACH

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Dennis Van Name	DENNIS VAN NAME, PARTNER	8/15/80

RP

Update

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

For Official Use Only

Comments: C C

Installation's EPA ID Number		Approved	Date Received (yr. mo. day)	
C F NJD002324903	T/A C 1		8 0 0 8 1 8	Camden

I. Name of Installation

New Jersey Rivet Company

II. Installation Mailing Address

Street or P.O. Box: C 3 1785 Haddon Avenue

City or Town	State	ZIP Code
C 4 Camden	NJ	0 8 1 0 3

III. Location of Installation

Street or Route Number: C 5 Same

City or Town	State	ZIP Code
C 6		

IV. Installation Contact

Name and Title *(last, first, and job title)*	Phone Number *(area code and number)*
C 2 Van Name, Dennis - Pr	609 963 2237

V. Ownership

A. Name of Installation's Legal Owner	B. Type of Ownership *(enter code)*
C R New Jersey Rivet Co.	P

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [X] 1b. Less than 1,000 kg/mo.
- [ ] 2. Transporter
- [ ] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer *(or On site Burner)* Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [ ] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [X] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number

ID — For Official Use Only																		
C																	T/A	C
W																		1

X. Description of Hazardous Wastes *(continued from front)*

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
D001					
7	**8**	**9**	**10**	**11**	**12**

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

- ☒ 1. Ignitable *(D001)*
- ☐ 2. Corrosive *(D002)*
- ☐ 3. Reactive *(D003)*
- ☐ 4. Toxic *(D000)*

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
Dennis Van Name	Dennis Van Name	5/14/90

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

NOV 09 1989

Mr. Dennis Van Namme
President
New Jersey Rivet Company
1785 Haddon Avenue
Camden, New Jersey 08103

RE: New Jersey Rivet Company
NJD002324903

Dear Mr. Van Namme:

Your submittal in response to the warning letter dated October 17, 1989 has been deemed satisfactory. Your company has been entered in our Data Management System as having achieved physical compliance with the violation cited in the above referenced letter. This matter can now be considered concluded and the enforcement action resolved.

With regard to your question on how often the LDR notification form should be employed, the regulations require that they be used for each shipment of restricted waste emanating from your facility.

Please be advised your facility is under the continuing obligation to comply with all the applicable state and federal regulations regarding the management of hazardous waste. Subsequently, if your facility should be found in violation of the regulation in the future, you may be subject to escalated enforcement action, including monetary penalties. If you have any questions contact James Sullivan at (212) 264-6150.

Sincerely yours,

George Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: Wayne Howitz
Assistant Director
Hazardous Waste Enforcement
New Jersey Department of
Environmental Protection

bcc: L. Livingston, PAB
G. Meyer, AWM-HWC
J. Sullivan, AWM-HWC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
JACOB K. JAVITS FEDERAL BUILDING
NEW YORK, NEW YORK 10278

OCT 17 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dennis Van Name
President
New Jersey Rivet Company
1785 Haddon Avenue
Camden, New Jersey 08103

Re: New Jersey Rivet Company
EPA ID No. NJD002324903

Dear Mr. Van Name:

This Warning Letter is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendments of 1984 ("HSWA") 42 U.S.C. §§ 6901, 6928.

Pursuant to HSWA on November 7, 1986, EPA promulgated regulations which prohibited the land disposal of restricted waste. 51 Fed. Reg. 40,572 (November 7, 1986). These regulations are published in 40 CFR Part 268, and amend various sections of 40 CFR Parts 260-265 and 270. They became effective on November 8, 1986.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal regulations ("LDR").

On or about June 9, 1989, a duly authorized representative of EPA conducted an inspection of New Jersey Rivet Company, Camden, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the EPA inspector noted that:

1. 40 CFR § 268.7(a)(1) which is one of the provisions of the LDR, has been violated. Section 268.7(a)(1) requires the following:

Before a generator offers waste subject to the LDR to a treatment facility, the generator must notify the treatment facility in writing of the appropriate treatment standards set forth in Subpart D of 40 CFR Part 268.

The notice must include the following information:

(i) EPA Hazardous Waste Number;

(ii) The corresponding treatment standards and all applicable prohibitions set forth in § 268.32 or RCTA section 3004(d);

(iii) The manifest number associated with the shipment of the waste; and

(iv) Waste analysis data, where available.

At the time of the above referenced inspection, several manifest copies regarding the shipment of an "F006" waste which exceeded the 134 mg/l prohibition level for nickel were found to be without the required LDR notification. EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 C.F.R. Part 268. You must submit within thirty (30) days of the receipt of this letter, documentation, and a description of the actions you have taken to correct the violations noted above and to implement the regulations published in 40 C.F.R. Part 268.

Failure to comply with the requirements of this Warning Letter may subject you to penalties of up to twenty-five thousand dollars ($25,000) for each day of noncompliance in accordance with Section 3008 of RCRA, 42 U.S.C. § 6928.

If you have any questions regarding this matter, please contact Mr. James Sullivan, of my staff at (212) 264-6150.

Sincerely yours,

George C. Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: Wayne Howitz, Assistant Director
Hazardous Waste Enforcement
New Jersey Department of
Environmental Protection

bcc: L. Livingston, PAB
G. Meyer, AWM-HWC
J. Sullivan, AWM-HWC

ATTACHMENT

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

Generator: NEW JERSEY RIVET CO.

EPA ID NUMBER: NJD002324903 MANIFEST NUMBER: -

WASTE NAME: Hazardous Waste Solid, NOS ORM-E NA9189 EPA F006 RQ 1LB

This form is submitted to Compliance Recycling, Inc. in accordance with regulations published by EPA in 40CFR 268, which govern the land disposal of certain untreated hazardous wastes. The hazardous waste identified above is one of the "Californis List" wastes under EPA'S Part 268 regulations.

RESTRICTED WASTE REQUIRES TREATMENT

Nickel in this waste exceeds 134 PPM

Treatment standards set forth in 268.41 are as follows:

Constitutant Concentration in Waste Extract	Mg/liter
Cadmium	.066
Chromium(total)	5.2
Lead	.51
Nickel	.32
Silver	.072

Treatment standards set forth in 268.43 are as follows:

Constitutent concentration Waste	Mg/liter
Cyanides(total)	590
Cyanides(amendable)	30

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

President

Signature Title Date

NEW JERSEY RIVET COMPANY
TUBULAR RIVETS FROM ALL MATERIALS
1785 HADDON AVENUE, CAMDEN, NEW JERSEY 08103
(609) 963-2237

October 31, 1989

United States EPA
Region II
Jacob K. Javits Federal Bldg.
New York, New York 10278

Attention: Mr. George C. Meyer, P.E.

Gentlemen:

Since June 9 we have been including a California land band restriction notification with each of the F006 shipments that we made, and we faxed copies of the forms which we had used to your Mr. James Sullivan.

After conversing with Mr. Sullivan, we have revised our notification and have attached a copy of this notification. We would appreciate your checking it over and advising if it is satisfactory as is or if there are other changes which you would like us to make.

We are presently shipping this waste to a recycling facility (Compliance Recycling, 1605L Harmer Street, Levittown,PA 19020), and they have asked us whether it would be possible for us to notify them of these land bandrestrictions once and then not have to include this form with each shipment. If this is acceptable, please advise so that we can institute this practice.

Assuring you of our cooperation at all times, we are

Very truly yours,
NEW JERSEY RIVET COMPANY

Dennis Van Name

Dennis Van Name,President
NEW JERSEY RIVET CO.INC.
GENERAL PARTNER

DVN/t
Enc.

SINCE 1934 SPECIALIZING IN THE MANUFACTURE OF SEMI-TUBULAR RIVETS

FAX # 609-963-2367

1785 HADDON AVENUE
CAMDEN, NEW JERSEY 08103
(609) 963-2237

NEW JERSEY RIVET COMPANY

TO: EPA ATTENTION: James Sullivan

SENT BY: DENNIS VAN NAME DATE: 10/23/89

NUMBER OF PAGES INCLUDING THIS SHEET 4

Here are the two forms I have used for Land Band Notification. If there are problems please advise. I have added to 1 form the wording "Ni exceeds 134 PPM"

ATTACHMENT 2

LAND DISPOSAL RESTRICTION NOTIFICATION FOR CALIFORNIA LIST WASTES

Generator: NEW JERSEY RIVET CO. Du Pont Approval Number: OW9381

EPA ID Number: NJD002324903 Manifest Number: _____

WASTE NAME: HAZARDOUS WASTE LIQUID, N.O.S.;ORM-E; NA9189(F006),RQ

This form is submitted to E. I. du Pont de Nemours and Company, Inc. in accordance with regulations published by EPA in 40 CFR 268, which govern the land disposal of certain untreated hazardous wastes. The hazardous waste identified above is one of the "California List" wastes under EPA's Part 268 regulations. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below that indicates how my waste must be managed to conform to the land disposal ban regulations. (See instructions on reverse side for marking appropriate box.)

RESTRICTED WASTE REQUIRES TREATMENT

(1) [✓] I am the initial generator of the untreated waste identified above that must be treated to the appropriate treatment standard set forth in 40 CFR 268 Subpart D, or where no treatment standard exists for the California List waste, the waste must be treated to the levels specified under 40 CFR 268.32.

NI EXCEEDS 134 PPM

RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

(2) [ ] The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D and/or the applicable prohibitions set forth in 40 CFR 268.32. "I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

RESTRICTED WASTE SUBJECT TO VARIANCE

(3) [ ] The waste identified above is subject to a case-by-case extension under 40 CFR 268.5, a no-migration petition under 40 CFR 268.6, a nationwide variance under Subpart C, or is soil or debris generated from a response action taken under CERCLA or corrective action taken under RCRA.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Dennis L Van Horn President _____

Signature Title Date

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FOR SOFT HAMMER WASTES

Generator Name: X NEW JERSEY RIVET COMPANY Lab Code Number: X LB14800

EPA ID Number: X NJD002324903 Manifest Number: X PAC 1114175

Line Item		EPA Waste Numbers
11a	ELECTROPLATING SLUDGE	X F006
11b		
11c		
11d	X	

This form is submitted to WASTE CONVERSION in accordance with EPA regulations in 40 CFR Part 268, which govern the land disposal of certain untreated hazardous wastes. The hazardous waste identified above is one of the soft hammer wastes as specified under EPA's part 268 regulations. In accordance with recordkeeping requirements established in 40 CFR 268.7 and 268.8, I have marked the appropriate box below which indicates how my waste must be managed to conform to the land disposal ban regulations.

[X] 1. Soft Hammer Waste for Which Practical Treatment or Recovery is Available

I am the generator of the untreated soft hammer wastes identified above. I have located and demonstrated practical available technology which yields the greatest environmental benefit. I have submitted a demonstration in accordance with 40 CFR 268.8 (a) (1) and provided a copy of this with the initial waste shipment. This waste must be treated and disposed of in accordance with my demonstration.

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

[ ] Demonstration Attached (initial shipment) Dennis Van Ness

[ ] 2. Soft Hammer Waste For Which There Is No Practical Treatment or Recovery Available

I am the generator of the untreated soft hammer wastes identified above. I have made a good faith effort to locate and contract with treatment and recovery facilities practically available which provide the greatest environmental benefit. Based on my demonstration, land disposal is the only practical technology available. This soft hammer waste must be disposed of in a land disposal facility which meets the minimum technology requirements

I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

[ ] Demonstration Attached (initial shipment)

[ ] 3. Soft Hammer Waste Treated by Treatment or Recovery Facility

The soft hammer waste(s) identified above was treated in accordance with the generator's demonstration.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

LAND DISPOSAL RESTRICTION NOTIFICATION/CERTIFICATION FOR CALIFORNIA LIST WASTES

Generator Name: NEW JERSEY RIVET COMPANY Lab Code Number: LB14800

EPA ID Number: NJD002324903 Manifest Number: PAC 1114175

Line Item	EPA Waste Numbers
ELECTROPLATING SLUDGE	F006

This form is submitted to WASTE CONVERSION in accordance with regulations published by EPA in 40 CFR Part 268, which govern the land disposal of certain untreated hazardous wastes. The hazardous waste identified above is one of the "California List" wastes under EPA's Part 268 regulations. In accordance with the waste analysis and recordkeeping requirements specified by EPA in 40 CFR 268.7, I have marked the appropriate box below which indicates how my waste must be managed to conform to the land disposal ban regulations.

☒ 1. Restricted Waste Requires Treatment

I am the generator of an untreated waste identified above which must be treated to the appropriate treatment standard set forth in 40 CFR 268 Subpart D, or where no treatment standard exists for the California List waste, the waste must be treated to the levels specified under 40 CFR 268.32.

☐ 2. Restricted Waste Treated to Performance Standards

The waste identified above has been treated in compliance with the applicable performance standards specified in 40 CFR 268 Subpart D and/or the applicable prohibitions set forth in 40 CFR 268.32.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

☐ 3. Restricted Waste Meets Treatment Standards Without Prior Treatment

The waste identified above naturally meets the performance standards of 40 CFR Part 268 Subpart D or 40 CFR 268.32 without any treatment being performed.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D or 40 CFR 268.32. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

☐ 4. Restricted Waste Subject to Variance

The waste identified above is not banned from land disposal since it is subject to a variance. Check the appropriate box.

	Expiration Date
☐ Nationwide variance under Subpart C (110C)	Nov. 8, 1988
☐ Case by case extension under 40 CFR 268.5	
☐ No Migration Petition under 40 CFR 268.6	
☐ Soil or debris from CERCLA response or RCRA corrective action	

PRESIDENT 8/4/89

ROUTING AND TRANSMITTAL SLIP

Date 10/23/89

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Dennis Van Name		
2. NJ Rivet		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance	☒	Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

The information circled in red is applicable to an "F006" waste stream and should appear on a LDR notification for any "F006" wastes which ~~meet~~ exceed these treatment standards. The EPA Hazardous Waste Number & Manifest Number must also appear on the Notification.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Jim Sullivan	2AWM-HW
	Phone No. 212-264-6150

5041-102

☆ U.S.G.P.O. 1984 -421-529/416

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

(3) Persons have been granted an extension to the effective date of a prohibition pursuant to § 268.5, with respect to those wastes covered by the extension.

(f) Between August 8, 1988, and May 8, 1990, the wastes specified in § 268.10 for which treatment standards under Subpart D of this Part are not applicable, including those wastes which are subject to the statutory prohibitions of RCRA section 3004(d) or codified prohibitions under § 268.32 of this Part, but not including wastes subject to a treatment standard under § 268.42 of this Part, are prohibited from disposal in a landfill or surface impoundment unless the wastes are the subject of a valid demonstration and certification pursuant to § 268.8.

(g) To determine whether a hazardous waste listed in § 268.10 exceeds the applicable treatment standards specified in § 268.41 and § 268.43, the initial generator must test a representative sample of the waste extract or the entire waste depending on whether the treatment standards are expressed as concentrations in the waste extract or the waste. If the waste contains constituents in excess of the applicable Subpart D levels, the waste is prohibited from land disposal and all requirements of Part 268 are applicable, except as otherwise specified.

Subpart D—Treatment Standards

13. Section 268.40 is amended by revising paragraph (a) and adding a new paragraph (c) to read as follows:

§ 268.40 Applicability of treatment standards.

(a) A restricted waste identified in § 268.41 may be land disposed only if an extract of the waste or of the treatment residue of the waste developed using the test method in Appendix I of this part does not exceed the value shown in Table CCWE of § 268.41 for any hazardous constituent listed in Table CCWE for that waste.

* * * * *

(c) A restricted waste identified in § 268.43 may be land disposed only if the constituent concentrations in the waste or treatment residue of the waste do not exceed the value shown in Table CCW of § 268.43 for any hazardous constituent listed in Table CCW for that waste.

14. In Table CCWE in § 268.41(a), in the column headed "P001–P005 spent solvents," "methylene chloride (from the pharmaceutical industry)" and its corresponding concentrations is deleted, and the following subtables to Table CCWE are added in numerical order by EPA Hazardous Waste Number:

§ 268.41 Treatment standards expressed as concentrations in waste extract.

(a) * * *

TABLE CCWE—CONSTITUENT CONCENTRATIONS IN WASTE EXTRACT

* * * * *

F006 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Cadmium	0.066
Chromium (Total)	5.2
Lead	.51
Nickel	.32
Silver	.072
Cyanides (Total)	Reserved

K001 nonwastewaters (see also Table in § 268.43)	Concentration (in mg/l)
Lead	0.51

K022 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Chromium (Total)	5.2
Nickel	0.32

K046 nonwastewaters (Nonreactive Subcategory)	Concentration (in mg/l)
Lead	0.18

K048, K049, K050, K051 and K052 nonwastewaters (see also Table CCW in § 268.43)	Concentration (in mg/l)
Arsenic	0.004
Chromium (Total)	1.7
Nickel	.048
Selenium	.025

K061 nonwastewaters (Low Zinc Subcategory—less than 15% total zinc)	Concentration (in mg/l)
Cadmium	0.14
Chromium (Total)	5.2
Lead	.24
Nickel	.32

K061 nonwastewaters (High Zinc Subcategory—15% or greater total zinc); effective until 8/8/90	Concentration (in mg/l)
Cadmium	0.14
Chromium (Total)	5.2
Lead	.24
Nickel	.32

Subpart D—Treatment Standards

6. In § 268.41, Table CCWE is amended by removing from the subtable for F006 nonwastewaters "Cyanides (Total) * * * Reserved", and by adding the following subtables to Table CCWE in alphabetical/numerical order by EPA Hazardous Waste Number.

§ 268.41 Treatment standards expressed as concentrations in waste extract.

(a) * * *

TABLE CCWE—CONSTITUENT CONCENTRATIONS IN WASTE EXTRACT

* * * * *

F007, F008, and F009 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Cadmium	0.066
Chromium (total)	5.2
Lead	0.51
Nickel	0.32
Silver	0.072

F011 and F012 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Cadmium	0.066
Chromium (total)	5.2
Lead	0.51
Nickel	0.32
Silver	0.072

F024 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Chromium (total)	Reserved.
Nickel	Reserved.

K028 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Chromium (total)	Reserved.
Nickel	Reserved.

K115 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Nickel	0.32

P074 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Nickel	0.32

P088 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Silver	0.072

P104 nonwastewaters (see also table CCW in § 268.43)	Concentration (in mg/l)
Silver	0.072

* * * * *

7. In § 268.42, paragraphs (a)(3) and (a)(4) are added to read as follows:

§ 268.42 Treatment standards expressed as specified technologies.

(a) * * *

(3) The nonwastewater form of the following hazardous wastes listed in §§ 268.10, 268.11, and 268.12 must be incinerated in accordance with the requirements of Part 264, Subpart O, or Part 265, Subpart O, or burned in boilers or industrial furnaces burning in accordance with applicable regulatory standards: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P082, P085, P109, P111, U058, U087, U221, and U223.

(4) The wastewater form of the following hazardous wastes listed in §§ 268.10, 268.11, and 268.12 must be treated by carbon adsorption, or incineration, or pretreatment followed by carbon adsorption: K027, K039, K113, K114, K115, K116, P040, P041, P043, P044, P082, P035, P109, P111, U058, U087, U221, and U223.

* * * * *

8. In § 268.43, paragraph (a) is revised; Table CCW is amended by revising the subtable for P006 nonwastewaters; by revising the subtables for K024 wastewaters and nonwastewaters; by removing K004 and K008 from the subtable for No Land Disposal; by adding the following subtables in alphabetical/numerical order by EPA hazardous waste number, and by adding paragraph (b) and K005 and K007 to the subtable for No Land Disposal to read as follows:

§ 268.43 Treatment standards expressed as waste concentrations.

(a) Table CCW identifies the restricted wastes and the concentrations of their associated hazardous constituents which may not be exceeded by the waste or treatment residual (not an extract of such waste or residual) for the allowable land disposal of such waste or residual. The wastewater and nonwastewater treatment standards in Table CCW are based on analysis of grab samples except the wastewater treatment standards that are based on analysis of composite samples for wastes, K009, K010, K036, K038, K040, P039, P071, P089, P094, P097, and U235.

TABLE CCW—CONSTITUENT CONCENTRATION IN WASTES

* * * * *

F006 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Cyanides (Total)	590
Cyanides (Amenable)	30

F007, F008, and F009 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
Cyanides (Total)	590
Cyanides (Amenable)	30

F007, F008, and F009 wastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/l)
Cyanides (Total)	1.9
Cyanides (Amenable)	0.10
Chromium (Total)	0.32
Lead	0.04
Nickel	0.44

F010 nonwastewaters	Concentration (in mg/kg)
Cyanides (Total)	1.5

F010 wastewaters	Concentration (in mg/l)
Cyanides (Total)	1.9
Cyanides (Amenable)	0.10

F011 and F012 nonwastewaters [1]	Concentration (in mg/kg)
Cyanides (Total)	110
Cyanides (Amenable)	0.1

[1] Effective December 8, 1989; from July 8, 1989 until December 8, 1989, these wastes are subject to the same treatment standards as F007, F008, and F009 nonwastewaters (see also Table CCWE in § 268.41).

F011 and F012 wastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/l)
Cyanides (Total)	1.9
Cyanides (Amenable)	0.10
Chromium (Total)	0.32
Lead	0.04
Nickel	0.44

F024 nonwastewaters (see also Table CCWE in § 268.41)	Concentration (in mg/kg)
2-Chloro-1,3-butadiene	0.28
3-Chloropropene	0.28

To: JOHN SKOVIAK, BC+TS

From: TERRY W. OSTRANDER, SBFO

Date: 7/12/89

Subject: RCRA CEI AND LANDBAN REPORT
FOR . . NJ RIVET COMPANY
1785 HADDON AVE.
CAMDEN, NJ 08103
NJD002324903
INSPECTION OF 6/13/89

ATTACHED YOU WILL FIND A COPY OF THE RCRA CEI AND LANDBAN REPORTS FOR NJ RIVET. PLEASE TRANSMIT THIS COPY TO USEPA REGION II. IT IS SUSPECTED THAT THERE IS A VIOLATION OF LANDBAN IN THAT F006 SLUDGE SHIPPED OFF-SITE FAILED TO HAVE A NOTIFICATION PERTAINING TO NICKEL WHEN THE CALIFORNIA STANDARD WAS EXCEEDED AT 180 MG/L.

cc: FILE
BEN WILBUR
JACK ALLEN

CONFIDENTIAL - RECOMMENDATIONS

TO: Terry Ostrander JACIC ALLEN FOR TO

FROM: Ben Walton DATE: 6-15-89

SUBJECT: W J Rivet

I believe that W J Rivet has been conscientious about trying to properly handle their waste. At the present time, they are (have been since Jan 1989) examining the possible use of ion exchange recovery technology to recover/eliminate future waste generation.

Mr. Rivet name has been very cooperative and I suggest he be considered as a candidate for the waste assistance program at NJIT

Form HWM-004
3/87

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
5th Fl., 401 E. State St., Trenton, N.J. 08625

NOTICE OF VIOLATION

ID NO. NJD 002324903 DATE June 13, 1989

NAME OF FACILITY New Jersey Rivet Co.

LOCATION OF FACILITY 1785 Haddon Ave Camden New Jersey

NAME OF OPERATOR Mr. Dennis Van Nome

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

Class I * 7:26-12.1(a) Construction, installation, modification or operation of a hazardous waste facility without submitting Part A and B of a permit application including a Disclosure Statement and an Environmental and Health Impact Statement as required by the Department

Class I 7:26-9.3(a)1 Failure to ship hazardous waste off-site within 90 days

Remedial action to correct these violations must be initiated immediately and be completed by July 14 1989. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $25,000 per violation.

Benjamin C. Addams
Investigator, Division of Waste Management
Department of Environmental Protection
Southern Bureau Field Office
20 East Clementon Road
Gibbsboro NJ 08026
Suite 303N.

NEW JERSEY RIVET COMPANY
TUBULAR RIVETS FROM ALL MATERIALS
1785 HADDON AVENUE, CAMDEN, NEW JERSEY 08103
(609) 963-2237

June 21, 1989

NJ Dept.E.P./Div.of Hazardous Waste Mgment.
20 East Clementon Road
Gibbsboro, NJ 08026

Attention: Mr. Benjamin C. Wilbur

Dear Ben,

We are attaching a copy of a letter to Mr. Tom Sherman requesting a ruling on our status if we put in a Compliance Recycling Industries system. We have signed a contract with C.R.I. subject to obtaining this approval as a generator only.

We are also attaching a copy of our letter of intent signed December 29, 1988 with C.R.I. which shows that we have been working on this for quite some time.

As we have discussed during our numerous meetings and also over the phone, we do not agree with your notice of violation dated June 13 since we do not feel we are storing hazardous waste for over 90 days. However, as you can see, we have been working on changing our system for the last nine months so we would have a system that would be safer to the environment since waste would be recycled. As we have discussed, we hope that you can agree with our position or agree that upon approval of our proposed system and after its installation, that the item in your June 13, 1989 Notice would not have to be done.

If you need any further clarification or information, please advise.

Very truly yours,
NEW JERSEY RIVET COMPANY

Dennis Van Nam

by Dennis Van Name, President
NEW JERSEY RIVET COMPANY INC.
GENERAL PARTNER

DVN/t
Encs.

NEW JERSEY RIVET COMPANY

June 21, 1989

Chief, Bureau of Hazardous Waste Engineering
5th Floor 401 East State Street
Trenton, NJ 08625-0028

Attention: Mr. Tom Sherman

Gentlemen:

Confirming our phone conversation with Mr. Fontana today, we would like you to look over the literature from Compliance Recycling Industries we are attaching. We are contemplating putting in this system since we think it offers many environmental as well as practical advantages over our present system.

This system would take rinse waters from our plating lines and put them through a resin which would remove the metals, cyanide and salts from the rinse water and return the clean rinse water to the rinse tanks on our plating lines. The resin would be returned to Compliance Recycling Industries within 90 days and they would extract the metals and salts for recycling.

Also we would be using a MacDermid "Wastesaver" on our zinc plating rinse which evaporates the rinse water and condenses the steam which is returned to the rinse tanks. The concentrate from this process would be returned to the plating tank thus recycling the chemicals.

We presently have a generator permit and would like confirmation that this is the only permit we will need. We are awaiting your response before proceeding with the contract we have signed(copy attached).

If there are any questions, please contact me.

Very truly yours,
NEW JERSEY RIVET COMPANY

DVN/t
Encs.
cc/Ben Wilbur,DEP

by Dennis Van Name, President
NEW JERSEY RIVET CO.INC.
GENERAL PARTNER

PURCHASE AGREEMENT

COMPLIANCE RECYCLING INDUSTRIES, INC. (hereafter referred to as CRI) proposes to furnish the following items and services to New Jersey Rivet Company (hereafter referred to as CUSTOMER). Acceptance of this proposal constitutes an agreement to purchase by the CUSTOMER and an agreement to deliver the equipment and services described herein by CRI.

1. HEAVY METAL/CYANIDE PRE-TREATMENT EQUIPMENT SYSTEM

CRI will provide a pre-treatment system (hereafter referred to as the Compliance System) to treat the rinse water streams outlined in the Consultant's Report Issued by CRI and dated April 3,1989. Any use of the Compliance System other than outlined in the Consultants Report will constitute a breech of contract by the customer as will any evidence of tampering with the modules or system without prior written authorization by CRI. In most cases, when used as recommended in the consulting report, the Compliance System will allow the recycling of the connected waste water stream as relatively good quality deionized water with minor organic contamination. Each Compliance System will consist of the following:

A. One (1) each Transfer Module

B. Two (2) each Compliance Modules

For each Compliance System, CUSTOMER agrees to pay the amount of TWENTY NINE THOUSAND FIVE HUNDRED DOLLARS AND NO CENTS ($29,500) as follows:

With the order---One half ($14,750.00).

Upon delivery of equipment---The remainder, less the original $1,000 deposit made with the Letter of Intent ($13,750.00).

Equipment is shipped F.O.B. San Antonio, TX. CRI reserves the right to deliver on its own truck or use a common carrier and in either case bill the customer for the freight from F.O.B. point to the customer.

2. REGENERATION SERVICES

Upon purchase of the Compliance System, the customer also agrees to use CRI regeneration services, and CRI agrees to provide to the customer, regeneration services for the Compliance Modules. When the Compliance Module is "loaded" as indicated by the alarm provided, the customer will switch his system to the stand by Compliance Module and notify CRI that the unit needs to be regenerated. Provided that CRI is notified the next working day after the module is "loaded", CRI will pick up, regenerate, and return the module within five (5) working days of the notification. CUSTOMER will deliver Compliance Modules to a paved area where CRI can load it onto their truck or trailer.

Regeneration services will be provided at a cost of EIGHT HUNDRED FIFTY DOLLARS AND NO CENTS ($850.00) for each regeneration. This price will remain in effect for a period of TWENTY FOUR (24) months from the date of the installation of the Compliance System, and CUSTOMER agrees to use this service for the TWENTY FOUR (24) months.

CRI reserves the right to refuse acceptance of a Compliance Module for regeneration should there be any indication that the module was used with an unapproved waste stream, or that the column contains materials that were not noted in the Consultant Report.

3. RESIN REPLACEMENT

Under normal operations approved by CRI, the resins in the Compliance Modules can be expect to have a useful life of several years. Abnormal use and physical damage to the system can cause premature failure or loss of the resin. Any resin replacement must be accomplished by CRI to assure continuity of the system. Resin replacement will be billed at the price in effect at the time the replacement is accomplished. Today's price for replacing resin is SIX THOUSAND TWO HUNDRED DOLLARS AND NO CENTS ($6,200) per column. The Consultant Report contains warnings and limitations on the resin and system which the customer hereby acknowledges and agrees are reasonable.

4. INSURANCE

Since the CUSTOMER will own and operate the Compliance System, and all retained materials will be from the CUSTOMERS operations, the CUSTOMER shall assume all the insurance responsibilities on the Compliance Modules and any other equipment involved in the CRI Compliance System.

5. This is subject To DEP approval of the system to be installed and that agreeing that this is a generator ~~facility~~ only. not a treatment or storage facility. ~~[redacted]~~ AS SAT.

TO: Dennis VanRam

1720-a byberry road
bensalem, pa 19020
(215) 638-3170

COMPLIANCE RECYCLING INDUSTRIES, INC.

LETTER OF INTENT

This is a letter of intent between Compliance Recycling Industries, Inc., hereafter referred to as CRI, and New Jersey Rivet Co., hereafter referred to as "Customer".

Execution of this document and payment of $1,000.00 to CRI by Customer, constitutes agreement by both parties to investigate the feasibility of placing a CRI Compliance System within the Customers operation with CRI to service said system. $450.00 of this amount will be used by CRI for the generation of a Consultant Report which will indicate to the Customer the expected Compliance Module regeneration life in the Customers operation. In the event CRI is asked by the Customer to perform other services, CRI may, after customer approval, perform and bill the Customer at the agreed price for these agreed services. CRI has the right to the unused portion of the above deposit if the customer does not pay for these additional agreed services within the agreed time. The above $1,000.00 deposit will be fully credited toward the purchase of any equipment purchased by Customer from CRI.

Customer also agrees to enter into a purchase agreement with CRI within 90 days of the delivery of the consultant report unless one of the following conditions exist:

Customer refuses to make a change required in the CRI consultant report.

CRI consulting report finds CRI can not fulfill customers needs.

Customer decides CRI can not fulfill its needs.

In the event any of the above three situations occur, CRI will refund any portion of the customers deposit remaining, and neither CRI nor Customer will be bound by this Letter of Intent and CRI will not be liable in any way for equipment or services upon return of the remainder of the deposit.

This agreement executed on 29 day of December, 19 88.

For the Customer, Dennis Van Ram Title, President

Customer Name, N.J. Rivet C.

Address, 1785 Haddon Ave

Camden N.J. 08033

For CRI, _____ Title, Regional Mgr

RA'D CICNU 5524 $1,000.00 MB 1/3/89

7. ACCEPTANCE

This proposal is accepted on the 14 day of June, 1989.

Compliance Recycling Industries, Inc.

P.O. Box 158

Levittown, PA 19059

Stephen R. Brainard

Regional Operational Manager

Stephen R. Brainard

New Jersey Rivet Company

1785 Haddon Avenue

Camden, NJ 08103

Dennis L. Van Name

President

Dennis Van Name

6 Delivery

Provided acceptance is made prior to June 21 delivery of the system would be made by late August

NB DM.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

Jim Coronades.
DHWM. Engineering
292-9880
Fax 633-1454

DWM-029

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: N.J. Rivet Co.

FILE NUMBER: needs file no. - 0408 Camden

VHT FACILITY FILE NUMBER: _____

PERMIT #: _____

REGION: 5

INSPECTION DATE: 5/12/89

INCIDENT/CASE NUMBER: _____

INSPECTION TYPE: RCRA CEI

RESPONSIBLE AGENCY CODE: _____

INSPECTOR'S NAME: Ben Wilbon

INSPECTOR'S AGENCY: DHWM; NJDEP

INSPECTOR'S BUREAU: Southern Field Office

EPA ID NUMBER: NJD 002324903

ADDRESS:
1785 Haddon Ave
Camden NJ 08103

LOT: 8 BLOCK: 1279.01

COUNTY: Camden / Code 0408

FACILITY PERSONNEL: Mr. Dennis Van Name
President

TELEPHONE #: (609) 963-2237

OTHER STATE/EPA PERSONNEL: Mr. Wayne Mounts
SBFO, DHWM

REPORT PREPARED BY: Ben Wilbon

REVIEWED BY: JACK ALLEN (JA for)

DATE OF REVIEW: WK of 7/3 - 7/7 1989

TIME IN: _____

TIME OUT: _____

PHOTOS TAKEN (__) YES (✓) NO IF YES, HOW MANY? _____

SAMPLE TAKEN (__) YES (✓) NO NO. OF SAMPLES _____

NJDEP SAMPLE ID#: _____

MANIFESTS REVIEWED (✓) YES (__) NO

Number of manifests in compliance all

Number of manifests not in compliance _____

List manifest document numbers of those manifests not in compliance.

-A1-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:

New Jersey Rivet Co makes rivets via a "stamping" process using steel wire feed stock. Most rivets that are made are sold as made. Subject Co (NJR) also plates rivets for specific customers. NJR uses a cyanide plating process and plates Nickel (Ni), Copper/Zinc-(brass) (Cu/Zn), and Cadmium (Cd). Also within their plating line, Chromic acid (H_2CrO_4) is used as a "treatment" for the zinc rivets. During the course of these separate plating operations various rinsing of the rivets is also done; final rinse waters are collected into a 40,000 gal inground tank (outside) and then shifted to another 40,000 gal tank (outside) for treatments to destroy Cyanide and also to Convert Chromium^{+6} to Chromium^{+3}. The "treated" waste is then pH adjusted to ~pH 9 to ppt precipitate the metals. This final "waste system" tank is then allowed to settle and then manifested off-site as D006 (top layer) and F006 (bottom "sludge"). F006 waste is further collected/concentrated in a 10,000 gal tank prior to manifesting off site.

Cont'd next page

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

The D006 wastes has been manifested off-site about every 2 months. The previous 7006 waste was manifested off-site in just under 3 month increments up until July 2 1988 when the 7006 waste was banned at Dupont. Since that time this material has been steadily collected at ~~70~~ NS Rivet until ~~Aug~~ April 2 1988 when it was manifested to West Pennsylvania as 7006 to a recycler Co (Inmetco).

The Company is treating their waste prior to disposal and as recently has been storing waste for greater than 90 days, all without permits as a TSD

~~Since all original "waste stream" Cantaro Cyanide~~ ~~it should be characterized as F007 and all subsequent~~ ~~wastes derived from this treatment are also F007~~ ~~wastes~~

Discussion - Kurt Whitford - Rinse waters are not "F" wastes. ie F007

-A3-

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

-B-

Describe the activities that result in the generation of hazardous waste.

Plating rinse water from all plating sources is collected via a trench in the plating areas and moved to an outside storage inground "tank"(s)(2-40,000 gal) this metal containing and cyanide containing rinse water is treated to reduce/remove cyanide, further treated to reduce Chromium 6 to Chromium +3, then pH adjusted to precipitate the metals as a sludge.
(In the past these wastes have been manifested out as D006 and F006)

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

As of the inspection there was about 40,000 gals of (assume) D003 & D006 & D007 type waste containing cyanide (D003), Cadmium (D006) and Chromium (D007). analysis not available at this time also there was about 5000 gal of D006, D007 waste.

N S Rivet has been treating this above material to remove the cyanide and then manifesting the material off site as D006 and F006 wastes. This is probably a waste misclassification since the material also contains Chromium and could also be as D007 waste. ~~D006 classification is clearly misclassified since F006 is a code for a water waste sludge (solid); the above materials all contain fair amounts of water when manifested off site.~~

GENERAL CHECKLIST

GENERAL		YES	NO	N/A	
7:26-7.4(a)1	Does the Generator have an EPA ID number?	✓			
HAZARDOUS WASTE DETERMINATION					
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	✓			Some tests have been run records not current
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?		✓		
	Is the waste hazardous?	✓			
7:26-8.5(d) Some data available	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF?	✓			
MANIFESTS					
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).				
7:26-7.4(a)4i	The generator's name, address and phone number.	✓			
7:26-7.4(a)4ii	The generator's EPA ID number.	✓			
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓			
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓			
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓			
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓			
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓			
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓			
7:26-7.4(a)4viii	Special handling instructions and any other information required on the	✓			

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓		
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?		~~X~~	N/A
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			N/A
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis) – ?	(✓)		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?			N/A
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			N/A

~~Section~~ has phone no. etc

manifests for 3 yrs

Some lab data on recent sludge 1.4 ppm CN

Some data for 3 yrs records not well organized

None

7:26-9.3 **Accumulation Time**

treated/stored 7006 waste from 7/88 to 4/89

How is waste accumulated on site?

? B 2

(__) Containers
(✓) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist) ←
(✓) Tanks (less than 90 days)
(✓) Above ground
(✓) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

		YES	NO	N/A
7:26-9.3(a)1	Is waste accumulated for more than 90 days?	✓	—	—

C1

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

Continued inspection as a generator needed to have HW Engineering review site concerning "tanks" possible impoundments

Short term accumulation standards for generators who accumulate waste in containers and tanks for 90 days or less:

		YES	NO	N/A
Containers				
7:26-9.4	What type of containers are used for storage. Describe size, type, quantity, and nature of waste (e.g. 12 fifty-five gallon drums of waste acetone).			N/A.
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?			
	If no, describe the problem (include number of containers involved.)			
7:26-9.4(d)4i	Are all containers securely closed except those in use?			
7:26-9.4(d)4iii	Do the containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing and/or leaking?			
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?			
7:26-9.4(d)4v	Is every container arranged so that its identification label is visible?			
7:26-9.4(d)5	Is the container storage area inspected at least daily?			
7:26-9.4(d)6	Are containers holding ignitable and reactive wastes located at least 50 (fifty) feet (15 meters) from the facilities property line?			
7:26-7.2(a)	Did the owner/operator conspicuously label appropriate manifest number on all hazardous waste containers that are intended for shipment?			
7:26-9.3(a)3	Is each container clearly dated with each period of accumulation so as to be visible for inspection?			

no wastes accumulated in drums

		YES	NO	N/A
7:26-7.2(b)	Did the owner/operator insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations? (49CFR 171, 179)			N/A

Tanks (Less than 90 day storage) ?

		YES	NO	N/A
7:26-9.3(b) inside steel tanks 9500 and 5000 gal outside 2 40000 gal inground concrete tanks engineering approval? ~3/4 yrs old permit?	Does the generator accumulate hazardous waste on-site in an above ground tank? If yes, describe the tank(s): 1) Capacity 9500 2) Shell thickness ~1/4" 3) Material Construction steel 4) Age of tank 3-4 years			
7:26-9.3(b) ? Class I	Does the generator have written approval from the Department to store hazardous waste(s) in this tank(s) for ninety days or less?		✓	
7:26-9.3(b)1 OK Jim Korowaicki ?	Does each tank(s) have sufficient shell thickness to ensure the tank will not collapse or rupture as specified by the Department?	✓		
7:26-9.3(b)4	Is the tank(s) designed so that at least 99% of the volume of each of the tanks can be emptied by direct pumping or drainage?	~~✓~~	✓	
7:26-9.3(b)5 inside tanked F006 collected 7/88 to 4/89 9500 gal.	Is each tank(s) rendered empty (1% or less remaining) every 90 days or less?		✓	
7:26-9.3(b)6	Are all wastes removed from the tank(s) shipped off-site to an authorized facility or placed in an on-site, authorized facility?	✓		
7:26-9.3(b)8 Can be inspected when empty	If part of the tank is below grade, is it constructed to allow visual inspection of the tank, comparable to a totally above-ground tank and is is secondary containment provided for the below grade part?		✓	
7:26-10.5(c)1 Epoxy ~~Ato~~ liner ?	Are materials which are incompatible with the material of construction of the tank(s) placed in the tank(s)?	✓		
7:26-10.5(c)2 ? ~~alarms~~ ?	Does the generator use appropriate controls and practices to prevent overfilling? alarms and ... bell	✓		

NO Engineering permits, letters etc available

~~Can't answer~~ need Engineering review. Engineering Supp OK

~~not~~ sides only tank not completely emptied

~~not~~ ~~sure~~ OK as/ Engineering

		YES	NO	N/A
7:26-10.5(g)2ii underground tks covered w/ hood but uncovered	For uncovered tanks, is there sufficient (two feet or acceptable documentation) freeboard to prevent overtopping by wave or wind action by or precipitation?	—	—	N/A
7:26-9.3(b)3 ii ✓	Does each tank(s) or storage tank area have secondary containment?	—	✓	—
7:26-10.5(d)1	Is the containment system capable of collecting and holding spills, leaks, and precipitation?	—	—	N/A
7:26-10.5(d)1i 2	Is the base underlying the tank(s) free from cracks, gaps, and sufficiently impervious to contain leaks, spills, and accumulated rainfall until the collected material is detected and removed?	—	—	N/A
7.26-10.5(d)ii ?	Does the containment system consist of material compatible with the wastes being stored?	✓	—	—
7:26010.5(d)iii ?	Is the containment system sloped or otherwise designed to efficiently drain and remove liquids resulting from leaks, spills and precipitation?	—	—	N/A
7:26-10.5(d)iii ?	Is the tank protected from contact with accumulated liquids?	—	—	N/A
7:26-10.5(d)iv	Does the containment system have sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tanks whichever is greater?	—	—	N/A
7:26-10.5(d)2	Is run-on into the containment area prevented?	—	—	N/A
	If not, explain.			
7:26-10.5(d)3	Is precipitation removed from the pump or collection area in a timely manner to prevent blockage or overflow of the collection system?	—	—	N/A
7:26-10.5(d)4	Is spilled or leaked waste removed from the pump or collection area daily?	—	—	N/A

no containment

		YES	NO	N/A
7:26-10.5(d)4i	If the collected material is hazardous waste under NJAC 7:26-8, it is managed as a hazardous waste in accordance with all applicable requirements of this chapter?	✓		
7:26-9.4(g)4	Personnel Training			
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?	✓		
7:26-9.4(g)5	Has facility personnel taken part in an annual review of initial training?		✓	
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan to implementation) relevant to the positions in which they are employed?	✓		
	Is there written documentation of the following:			
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	✓		
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	✓		
7:26-9.4(g)6iii	A written job description on the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?		✓	
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?		✓	
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓		

		YES	NO	N/A
7:26-9.6	Preparedness and prevention Does the facility comply with preparedness and prevention requirements including maintaining:			
7:26-96(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray system?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during systems during handling of hazardous waste?	✓		
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	✓		
	If no, please explain.			
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	✓		
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type waste handled on site:			N/A
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled - associated hazardous places where facility personnel would normally be working, entrances and roads inside facility and possible evacuation routes.	✓		

		YES	NO	N/A	
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	✓			
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment supplies?	✓			verbal only
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosion, or discharges at the facility?	✓			uses Occupational Health Service in Pennsauken
7:26-9.6(f)5	Arrangement with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	✓			
7:26-9.6(f)6	If authorities identified in (f)1 through 5, above decline to enter into such arrangements, has the owner, or operator documented this refusal in the operating record.			N/A	
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7.26-9.7?		✓		Mr. Van Horne indicated no drills. C/V
7:26-9.4(g)8i	If no, did the owner or operator petition the Department for an exemption from the semi annual drills requirement?		✓		C/V
7:26-9.4(g)8ii	Did the owner or operator petition the Department for an exemption excluding some or all local officials in the semi annual drill requirements?		✓		
	If yes, did the owner operator provide those specific local officials with written approval of the exemption?		✓		

no written agreement

		YES	NO	N/A
7:26-9.7	Contingency Plan and Emergency Procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents into air, soil or surface water?		✓	
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	✓		
7:26-9.7(c)	Does the contingency plan describes the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?		✓	
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 300 or a Discharge Prevention Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.		✓	
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?			N/A
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?		✓	

Mr. Dennis Van Nood indicated that he has no written plan

C1

C2

C2

C2

no plan ?

BW

		YES	NO	N/A	
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be names as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates?	✓			no plan per se but emergency notification @ local police
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment), where this equipment is required? Is the list up-to-date? In addition, does the plan include the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			local police have map @ site
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routed could be blocked by releases of hazardous waste or fires)?	✓			
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:				
	1. Maintained at the facility;		✓		
	2. Has the contingency plan been submitted to local authorities (police fire departments, emergency response teams)?	✓			
7:26-9.7(k)	Is there an employee on site or on call at all times with the responsibility of coordinating, all emergency response measures?	✓			procedures listed @ local police

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES
Bureau of Waste Management
P. O. Box 2063
Harrisburg, PA 17120

ER-SWM-51:REV. 6/87 Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: N J D 0 0 2 3 2 4 9 0 3 | Manifest Document No.: 1 0 2 8 0 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law but is required by State law.

3. Generator's Name and Mailing Address
NJ Pipe Rivet
1785 Haddon Ave., Camden, NJ 08103
4. Generator's Phone (609) 963-2237 bbb

A. State Manifest Document Number: PAB 5810280
B. State Gen. ID: same

5. Transporter 1 Company Name: Edward Armstrong & Sons, Inc.
6. US EPA ID Number: P A D 0 1 4 2 8 6 0 0 9
C. State Trans. ID: PA-AH 0 0 2 7

7. Transporter 2 Company Name
8. US EPA ID Number
D. Transporter's Phone (717) 393-2770
E. State Trans. ID: PA-AH

9. Designated Facility Name and Site Address
INMETCO
US Steel Industrial Park, Route 488
Ellwood City, PA 16117
10. US EPA ID Number: P A D 0 8 7 5 6 1 0 1 5
F. Transporter's Phone ( )
G. State Facility's ID: Not Required
H. Facility's Phone (412) 758-5515

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. "RQ" Hazardous Waste Liquid, N.O.S.; ORM-E; NA9189	0 0 1	T T	0 5 0 0 0	G	F 0 0 6
b.					
c.					
d.					

first F006 shipped since 7/14/88 Treatment/Storage for 9 months. on land ban

J. Additional Descriptions for Materials Listed Above (Include physical state and hazard code)

	Haz. Code	Physical State		Haz. Code	Physical State
a.	T	L	c.		
b.			d.		

K. Handling Codes for Wastes Listed Above: a. T-11 b. c. d.

15. Special Handling Instructions and Additional Information
DUPONT SEAL OWD366396
OWD366400 OWD366399 Decal # 23122
OWD366397 OWD369553 NJ DEP S7339
OWD366398

Bill to: Compliance Services, Inc.
151 S. Warner Rd., #200, Wayne, PA 19087
(Refer to #NJR89402 on invoice)

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: DENNIS VAN NAME
Signature: Dennis Van Name
Month Day Year: 0 8 2 7 8 9

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: FRANK R. SWEIGART
Signature: Frank R. Sweigart
Month Day Year: 0 8 2 7 8 9

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

19. Discrepancy Indication Space
INMETCO wt 44,710 lbs.

Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: BLADE Boots
Signature: Blade Boots
Month Day Year: 0 8 2 8 8 9

GENERATOR — TRANSPORTER — FACILITY

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

PAB 5810280

VHW 001 (REV 9/86)

9381
005

State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 027 Trenton, NJ 08625

Please type or print in block letters (Form designed for use on elite (12 pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-95

UNIFORM HAZARDOUS WASTE MANIFEST

1 Generator's US EPA ID No: NJD002324903 | Manifest Document No: 010138

2 Page 1 of 1 | Information in the shaded areas is not required by Federal law

A State Manifest Document Number: NJA0404997

3. Generator's Name and Mailing Address
N.J. RIVET COMPANY
1785 HADDON AVENUE
CAMDEN, NJ 08103

B State Generator's ID: SAME

4 Generator's Phone (609) 963-2237

5 Transporter 1 Company Name: CONTINENTAL VANGUARD, INC.

6 US EPA ID Number: NJD067387514

C State Trans. ID: NJDEPS-3516

7 Transporter 2 Company Name

8 US EPA ID Number

D Transporter's Phone (609) 931-0950

E State Trans ID

9. Designated Facility Name and Site Address
E.I. DUPONT DE NEMOURS & CO.
CHAMBERS WORKS PLANT - ROUTE 130
DEEPWATER, NJ 08023

10 US EPA ID Number: NJD002385730

F Transporter's Phone ( )

G State Facility's ID

H Facility's Phone (609) 540-2584

	11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12 Containers No.	Type	13 Total Quantity	Unit Wt./Vol.	14 Waste No.
a.	X	HAZARDOUS WASTE LIQUID, N.O.S.; ORM-E; NA9189 (F006),RQ	001	TT	02500	G	F006
b.							
c.							
d.							

J Additional Descriptions for Materials Listed Above

a. T; L (ELECTROPLATING SLUDGE) CALIF.LIST ATTACHED
CADMIUM OVER 100 MG/L
NICKEL OVER 134 MG/L
PH APPROX. 10

K Handling Codes for Wastes Listed Above

a. T01 c.

b. d.

15 Special Handling Instructions and Additional Information

DUPONT SEAL # OWD301100
RQ = 1 LB. OWD301097 OWD301096
OWD301099 OWD301098 OWD282824
OW-9381-005 OWD282784 OWD282900 OWD301103

NJ DROP # 23824

16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: DENNIS VAN NAME (On Behalf of Generator)
Signature: Dennis Van Name
Month Day Year: 07 14 88

17 Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Christopher T. Loomis
Signature
Month Day Year: 07 14 88

18 Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

19 Discrepancy Indication Space

FACILITY

TRANSPORTER

GENERATOR

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (800) 292-7172 (Night)

NJA0404997

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

HAZARDOUS WASTE MANAGEMENT FACILITY INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: New Jersey Rivet Co.

FILE NUMBER: _____

VHT FACILITY FILE NUMBER: _____

PERMIT #: _____

REGION: 5

INSPECTION DATE: 6-9-89

INCIDENT/CASE NUMBER: _____

INSPECTION TYPE: RCRA

RESPONSIBLE AGENCY CODE: _____

INSPECTOR'S NAME: Benjamin Wilborn

INSPECTOR'S AGENCY: DHWM NJDEP

INSPECTOR'S BUREAU: Southern Field Office

EPA ID NUMBER: NJD 002324903

ADDRESS:
1785 Haddon Ave
Camden NJ 08103

LOT: 8 BLOCK: 1279.01

COUNTY: Camden / Code 0407

FACILITY PERSONNEL: Mr. Dennis Van Nome
President

TELEPHONE #: (609) 963-2237

OTHER STATE/EPA PERSONNEL: Jim Koranda Jr. HW Engineering

REPORT PREPARED BY: Wilborn

REVIEWED BY: JACK ALLEN (TO) FOR

DATE OF REVIEW: WK OF 7/3 - 7/7 1989

REVISION: 3

PHOTOS TAKEN: (__) YES (✓) NO

SAMPLE TAKEN: (__) YES (✓) NO

If yes, how many?

NO. OF SAMPLES: _____ NJDEP ID #: _____

MANIFESTS REVIEWED: (✓) YES (__) NO

Number of Manifests in Compliance: all over past 3 years

Number of Manifests Not in Compliance: _____

List Manifest Document Numbers of Those Manifests Not in Compliance:

Describe the activities that result in the generation of hazardous waste.

Plating rinse water from all plating sources is collected via a trench in the plating areas and moved to an outside storage inground "tanks" (5) (2-40,000 gal) This metal containing and cyanide containing rinse water is treated to reduce/remove cyanide, further treated to reduce Chromium to Chromium +3, then pH adjusted to precipitate the metals as a sludge.
(In the past these wastes have been manifested out as D006 and F006)

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

As of the inspection there was about 40,000 gals of possible D003 & D006 & D007 type waste containing Cyanide (D003), Cadmium (D006) and Chromium (D007). Analysis not available at this time Also there was about 5000 gal of D006, D007 waste.

N S Rivet has been treating this above material to remove the cyanide and then manifesting the material off site as D006 and F006 wastes. This is probably a waste misclassification since the material also contains Chromium and could also be as D007 waste. ~~D006 classification is clearly misclassified since F006 is a code for a water waste sludge (solid); the above materials all contain fair amounts of water when manifested off site~~

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS:

New Jersey Rivet Co makes rivets via a "stamping" process using steel wire feed stock. Most rivets that are made are sold as made. Subject Co (NJR) also plates rivets for specific customers. NJR uses a cyanide plating process and plates Nickel (Ni), Copper/Zinc-(brass) (Cu/Zn), and Cadmium (Cd). Also within their plating line, Chromic acid (H_2CrO_4) was used as a "~~cleaner~~ treatment" for the zinc rivets. During the course of these separate plating operations various rinsing of the rivets is also done; ~~all~~ final rinse waters are collected into a 40,000 gal inground tank (outside) and then shifted to another 40,000 gal tank (outside) for treatments to destroy Cyanide and also to convert Chromium^{+6} to Chromium^{+3}. The "treated" waste is then pH adjusted to a pH 9 to ~~pp~~ precipitate the metals. This final "waste system" tote is then allowed to settle and then manifested off-site as D006 (top layer) and F006 (bottom "sludge"). F006 waste is further collected/concentrated in a 10,000 gal tank prior to manifesting off-site.

Cont'd next page

HWMF 3A

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS (continued):

The D006 wastes has ban manifested off-site about every 2 months. The previous 7006 waste was manifested off-site in just under 3 month increments up until July 2 1988 when the 7006 waste was banned at Dupont. Since that time this material has been steadily collected at ~~70~~ NS Rivet until ~~Aug~~ April 2 1989 when it was manifested to west Pennsylvania as 7006 to a recycler Co (Ansmetco).

The Company is treating their waste prior to disposal and as recently has been storing waste for greater than 90 days, all without permits as a TSD

~~Since all original "waste streams" Contains Cyanide it should be characterized as F007 and all subsequent wastes derived from this treatment are also F007 wastes~~

Discussion - Kurt Whitford - Rinse waters are not "F" wastes. ie F007

HAZARDOUS WASTE FACILITY STANDARDS

		YES	NO	N/A
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	✓		
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration.	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓		
7:26-7.4(a)1x	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?			N/A
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:			
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	(J)		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?			N/A
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			N/A

manifests not good lab analyses data documentation

None

is this required does not accept waste?

		YES	NO	N/A
7:26-9.4(b)	Waste Analysis			
7:26-9.4(b)1i	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis most contain all the information necessary for proper treatment storage or disposal of the waste).	✓		
7:26-9.4(b)1iii	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:		✓	
	Waste characteristics vary:			
	All waste(s) are basically the same:			metals waste
	Company treats all waste(s) as hazardous:			none
7:26-9.4(b)2	Is there a written waste analysis plan at the facility?		✓	
	Does it contain:			
7:26-9.4(2)i	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rational for the selection of these parameters?		✓	not formally written but waste is always analyzed
7:26-9.4(b)2ii	The test methods which will be used to test for these parameters?		✓	
7:26-9.4(b)2iii	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?		✓	
7:26-9.4(b)2iv	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?			N/A
7:26-9.4(b)2v	For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?			N/A
7:26-9.4(b)2vii	Procedures which will be used to identify changes in waste stream characteristics?			N/A
	Does hazardous waste come to this facility from an outside source? (e.g., another generator).		✓	N/A
	If yes, list the name(s) of generators.			

Cd line not constantly/continuously running but does run during 2 month waste collection treatment cycle

class 1*

1*

		YES	NO	N/A
7:26-9.4(b)4	If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?			N/A
	Does the plan describe:			
7:26-9.4(b)41	The procedures which will be used to determine the identity of each shipment of waste managed at the facility?			N/A
7:26-9.4(b)4ii	The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?			N/A
7:26-9.4(c)1	Did the facility accept hazardous waste which it is not authorized to handle?			N/A
7:26-9.4(i)	Are all records and results of waste analysis performed pursuant to NJAC 7:26-9.4(b) and 9.4(e) as applicable written in the operating log?			N/A
7:7:26-9.4(h)	Security			
	Does the facility have:			
7:26-9.4(h)1i	A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?	✓		
7:26-9.4(h)1ii	An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?	✓		
7:26-9.4(h)3	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		✓	

ADT alarm control panel not on outside gate

8 ft fence

2 gates

If no, explain what measures are taken for security.

24 hr. employees on site 5 day/week normal police drive-by

		YES	NO	N/A
7:26-9.4(f)	General Inspection Requirements			
7:26-9.4(f)1	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:			
7:26-9.4(f)1i	Discharge of hazardous waste constituents to the environment?		✓	
7:26-9.4(f)1ii	A threat to human health?		✓	
7:26-9.4(f)3	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to environmental or human health?		✓	
7:26-9.4(f)3i	Did the owner or operator submit the written inspection schedule to the department?		✓	
	If yes, when was it submitted?			
7:26-9.4(f)3iii	Is the written inspection schedule kept at the facility?		✓	
7:26-9.4(f)3iv	Does the schedule identify the types of problems to be looked for during the inspection?		✓	
7:26-9.4(f)3v	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?		✓	
7:26-9.4(f)5	Is there evidence that problems reported in the inspection log have not been remedied?			✓
7:26-9.4(f)6	Does the owner/operator record inspections in a log?		✓	

no written loop inspections as needed

no written schedule for daily checking all by gauges

by gauges checked as required

NO

ADT alarms checked each day

		YES	NO	N/A	
					no records
7:26-9.4(f)6	Are these records kept for at least three (3) years from the date of inspection?		✓		
7:26-9.4(f)6	Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?		✓		
7:26-9.4(g)	Personnel Training				
	Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six months of having been employed?		✓		RT to have training
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?		✓		Mr. Van None trains people
7:26-9.4(g)5	If yes, have facility personnel taken part in an annual review of training?		✓		
	Is there written documentation of the following:		—		
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?		✓	✗	only 1 plus Mr. Van None has training
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?		✓	✗	N/A
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?		✓		only 1 person Mr. Van None has procedure — no chng written
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?		✓		

		YES	NO	N/A
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	✓		
7:26-9.4(g)8	Are semi-annual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?		✓	
7:26-9.6	Preparedness and Prevention Does the facility comply with preparedness and prevention requirements including maintaining:			—
7:26-9.6(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	✓		
	If no, please explain.			

		YES	NO	N/A
	In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	✓		
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site?			N/A
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	✓		
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	✓		
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	✓		Verbal
7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	✓		
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two inspections annually?	✓		
7:26-9.7	Contingency Plan and Emergency Procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?		✓	

uses occupational Health Services Representation

Mr Van Vorst indicated that he had no written plan

		YES	NO	N/A
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?		✓	
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?		✓	
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with NJAC 7:1E-4.1 et seq.?		✓	
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?			N/A
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services?		✓	
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates?	✓		

no plan per se but there is emergency notification @ local police

Computer registration @ police dept

		YES	NO	N/A
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	✓		
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?		✓	
7:26-9.7(i)	Is a copy of the contingency plan and all revisions to the plan:			
	1. Maintained at the facility; and		✓	
	2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?		✓	
7:26-9.7(k)	Is there at least one employee on site or on call with the responsibility of coordinating all emergency response measures?	✓		
7:26-9.8	Closure Plan			
7:26-9.8(c)	Does the facility have a written closure plan?		✓	
	Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility?		✓	
	If yes, does the plan include:			

		YES	NO	N/A
7:26-9.8(e)1i	A description of how and when the facility will be partially closed (if applicable) and ultimately closed?			
7:26-9.8(e)1ii	The maximum extent of the operation which will be open during the life of the facility?			
7:26-9.8(e)2	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?			
7:26-9.8(e)3	A description of the steps needed to decontamination facility equipment during closure?			
7:26-9.8(e)4	A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?			
	Post Closure Plan			
7:26-9.9(g)	Does the facility have a written post-closure plan kept at the facility?			
	If yes, does the plan:			
7:26-9.9(i)	Identify the activities which will be carried on after closure and the frequency of these activities?			
7:26-9.9(i)1	Include a description of the planned ground water monitoring activities and frequencies at which they will be performed?			
7:26-9.9(i)2	Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:			
7:26-9.9(i)2i	The integrity of the cap and final cover or other containment structures where applicable?			
7:26-9.9(i)2ii	Describe the function of the facility monitoring equipment?			

		YES	NO	N/A
7:26-9.9(i)3	Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?			N/A
	Does the owner/operator have a written estimate of the cost of post-closure for the facility?			
	If yes, what is it?			

Please circle all appropriate activities and answer questions in appropriate sections all activities circled.

Storage	Treatment	Disposal
Container	Tank	Landfill
Tank, Above Ground	Surface Impoundments	
Tank, Below Ground	Incineration	Surface Impoundments
Surface Impoundments	Thermal Treatment	Other _____
Waste Piles		
Other _____	Chemical, Physical and Biological Treatment	
Other _____		

		YES	NO	N/A
7:26-9.4(d)	Containers What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone).			N/A
7:26-9.4(d)1i	Do the containers appear to be o sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste?			
	If no, explain.			

		YES	NO	N/A
7:26-9.4(d)1ii	Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?			N/A
	If no, explain.			
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?			
7:26-9.4(d)2	If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)3	Are hazardous wastes stored in containers made of compatible materials?			
7:26-9.4(d)4i	Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?			
	If no, explain.			
7:26-9.4(d)4iii	Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?			
	If no, explain.			
7:26-9.4(d)iv	Are containerized hazardous wastes segregated in storage by waste type?			
7:26-9.4(d)v	Are containerized hazardous wastes arranged so that their identification label is visible?			
7:26-9.4(d)5	Does the owner/operator inspect the container storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors?			
7:26-9.4(d)6	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?			

		YES	NO	N/A
7:26-9.4(d)7i	Are incompatible wastes, or incompatible wastes and materials placed in the same container?			
	If yes, explain.			
7:26-9.4(d)7ii	Are hazardous wastes placed in unwashed containers that previously held incompatible wastes?			
	If yes, explain.			
7:26-9.4(d)7iii	Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device?			
7:26-9.4(e)1i	Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?			
	If no, explain.			
7:26-9.4(e)1ii	Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?			
	If no, explain.			
7:26-9.4(e)1iii	Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?			
	If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health.			

N/A

		YES	NO	N/A
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?			N/A
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			
7:26-9.4(e)2v	Threaten human health or the environment?			
7:26-11.2	**Tanks**			
	What are the approximate number and size of tanks containing hazardous waste?			
	Identify the waste treated/stored in each tank.			
	General Operating Requirements			
7:26-11.2(a)2	Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?		✓	
	If yes, please explain.			
	Are there leaking tanks?		✓	
7:26-11.2(a)2	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger or ruptures, corrosion, leaks or other failures?	✓		
7:26-11.2(3)	Do uncovered tanks have at least two feet of freeboard or an adequate containment structure?			N/A
7:26-11.2(a)4	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?	✓		
7:26-11.2(c)	**Inspections**			
	Is the tank(s) inspected for:			
	1. Discharge control equipment (each operating day).		✓	

Jim Kosanoks of HW Eng. indicated 2 inground treatment units at NT Rine are considered tanks

Inside tanks
1 steel tank 9,000 gal
1 steel tank 5000 gal
2 inground outside tanks each 40,000 gal

HW Engineering indicates units OK Jim Kosanoks

walls can be seen tanks bottom not always readily

tanks have bypass valves and alarms

tanks covered

float level/alarm not generally Kosanoks each day

		YES	NO	N/A
	2. Monitoring equipment (each operating day).		✓	None
	3. Level of waste in tank (each operating day).		✓	
	4. Construction of materials of the tank (weekly).	✓		
	5. Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures (weekly)?	✓		
7:26-11.2(e)	Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?	✓		
	If no, please explain.			
7:26-11.2(f)	Does it appear that incompatible wastes are being stored separate from each other?	✓		
7:26-9.2(b)	Are there underground tanks used to store hazardous waste?	✓		?
	If yes, how many and can they be entered for inspection?	✓ 2		
	Has the underground tank been in use on or before November 19, 1980? Specify Date. (each 40,000 gal)		✓	
	If no, when was the tank placed in use?	1985		
7:26-9.2(b)3i	Does the facility have a ground water monitoring plan approved by the department?		✓	
7:26-9.2(b)3ii	Is the use of the tank specified to the manufacturers recommended lifetime?	✓	✗	Oil BW

Handwritten notes (left margin, beside items 2–5): not generally each day; input ~ ~~4000~~ 800 gal/day checked during week

Handwritten note (left margin, beside 7:26-9.2(b)): To be determined if this is a waste?

7:26-11.3 **Surface Impoundments** N/A

Describe the design and operating features of the surface impoundment to prevent ground water contamination (e.g., liner leachate collection system).

Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.

Handwritten note (left margin): needs to be determined by Engineering

Handwritten note (right margin): ungound ~~[illegible]~~ storage/treatment units at NJ River were reviewed by HW Engineering on 6/2 and were deemed to be Tanks

		YES	NO	N/A
7:26-11.3(a)	Is there at least two feet of freeboard in the impoundment?			N/A
7:26-11.3(b)	Do all earthen dikes have a protective cover to preserve their structural integrity?			
	If yes, please specify the type of covering.			
7:26-9.4(c)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?			
7:26-9.4(i)	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?			
7:26-11.3(d)	Does the owner or operator inspect:			
7:26-11.3(d)1	The freeboard level at least once each operating day to ensure compliance with subsection 11.3(a)?			
7:26-11.3(d)2	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?			
7:26-11.3(f)	Is ignitable or reactive waste placed in the surface impoundment?			
7:26-11.3(f)1	If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?			
7:26-11.3(f)1i	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?			

		YES	NO	N/A
7:26-11.3(f)1ii	Is the waste treated, rendered or mixed so that it does not:			N/A
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	—
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, of gases in sufficient quantities to threaten human health?	—	—	—
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	—	—	—
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?	—	—	—
7:26-9.4(e)2v	Threaten human health or the environment?	—	—	—
7:26-11.3(f)2	Is the surface impoundment used solely for emergencies?	—	—	—
7:26-11.3(g)	Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?	—	—	—
	If yes, is the waste managed so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	—
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	—	—	—
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?	—	—	—
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?	—	—	—
7:26-9.4(e)2v	Threaten human health or the environment?	—	—	—
7:26-11.4	Landfills — N/A			
	Identify the types of waste and size of the landfill.			
	General Operating Requirements			
7:26-11.4(a)1	Is run-on diverted away from all portions of the landfill?	—	—	N/A —

		YES	NO	N/A
7:26-11.4(a)2	Is runoff from active portions of the landfill collected?			
7:26-11.4(a)3	Is waste which is subject to wind dispersal controlled?			
	Please explain how.			
7:26-11.4(a)4	Does waste disposal or the disposal operation occur within 200 feet (60.6 meters) of the property boundary?			
7:26-11.4(a)6	Are untreated, ignitable, or reactive wastes placed in the landfill?			
	If yes, explain.			
7:26-11.4(a)7	Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell?			
	If yes, explain.			
7:26-11.4(a)8	Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?			
	If yes:			
7:26-11.4(a)8i	Does the hazardous waste landfill have a liner which is chemically and physically resistant to the added liquid and a functioning leachate collection and removal system with a capacity sufficient to remove all leachate produced?			
7:26-11.4(a)8ii	Before disposal, is the liquid waste or waste containing free liquids treated or stabilized, chemically or physically, so that free liquids are no longer present?			
7:26-11.4(a)9	Are containers holding liquid waste or waste containing free liquids placed in a hazardous waste landfill?			
	If yes:			
7:26-11.4(a)9i	Is the container designed to hold liquids or free liquids for a use other than storage, such as a battery?			

		YES	NO	N/A
7:26-11.4(a)9ii	Is the container very small, such as an ampule?			N/A
7:26-11.4(a)10	Are empty containers crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a hazardous waste landfill?			
7:26-11.4(a)11	Does the owner or operator of a hazardous waste landfill continue to dispose of hazardous wastes subsequent to the detection of any liquid, in the secondary collection system?			
7:26-11.4(b)	Does the owner or operator of a hazardous waste landfill maintain an operating record required in NJAC 7:26-9.4(i)?			
7:26-11.4(b)1	Does the owner/operator maintain a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks?			
7:26-11.4(b)2	The contents of each cell and the appropriate location of each hazardous waste type within each cell?			
	Are containers holding liquid waste or waste containing free liquids placed in the landfill?			
	Please describe the types and contents of such containers placed in the landfill.			
	Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried?			
	Are small containers of hazardous waste in overpacked drums placed in the landfill?			
	If yes, please describe precautions taken to prevent the release of the waste.			
7:26-11.5	Incinerator — N/A			
	What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			

		YES	NO	N/A
	Is the residue from the incinerator a hazardous waste?			N/A
	What types of air pollution control devices (if any) are installed in the incinerator unit?			
	Is energy recovered from the process?			
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.5(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.5(b)1i	Heating value of the waste?			
7:26-11.5(b)1ii	Halogen and sulfur content?			
7:26-11.5(b)1iii	Concentrations of lead and mercury?			
7:26-11.5(2)	If no to any of the above questions, is there justification and documentation?			
	If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?			
	<u>Monitoring and Inspection</u>			
7:26-11.5(c)1	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?			
	If no, explain.			
7:26-11.5(c)1	Does the incinerator have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).			
	If no, explain.			
7:26-11.5(c)2	Is the stack plume observed visually at least hourly for opacity and color?			

		YES	NO	N/A
7:26-11.5(c)3	Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc.?			N/A
	If yes, describe.			
7:26-11.5(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?			
	Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained.			
	If yes, explain.			
7:26-11.5(c)3	Is the incinerator inspected daily?			
7:26-11.6	Thermal Treatment			
	What type of thermal treatment is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).			N/A
	List the types and quantities of hazardous waste thermally treated.			
	Is the residue from the thermal treatment unit a hazardous waste?			
	What types of air pollution control devices (if any) are installed in the thermal treatment unit?			
	Is energy recovered from the process?			
	If yes, describe.			
	What is the destruction and removal efficiency for the organic hazardous waste constituents?			
7:26-11.6(b)1	Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:			
7:26-11.6(b)1i	Heating value of the waste?			
7:26-11.6(b)1ii	Halogen and sulfur content?			
7:26-11.6(b)1iii	Concentrations of lead and mercury?			

		YES	NO	N/A
7:26-11.6(2)	If no to any of the above questions, is there justification and documentation?			N/A
	If operating, does it appear the thermal treatment unit is operating at steady state for conditions of operation, including temperature and air flow?			
	Monitoring and Inspection			
	Are existing instruments relating to combustion and emission controls monitored every 15 minutes?			N/A
	If no, explain.			
7:26-11.6(c)1	Does the thermal treatment have all the following instruments for measuring: Wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle Missing Instruments).			
	If no, explain.			
7:26-11.6(c)2	Is the stack plume observed visually at least hourly for opacity and color?			
7:26-11.6(c)3	Are there any signs of leaks, spills and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?			
	If yes, describe.			
7:26-11.6(c)3	Are all emergency shutdown controls and system alarms checked to assure proper operation?			
	Is there any reason to believe the thermal treatment unit is being operated improperly? i.e., steady state conditions are not maintained.			
	If yes, explain.			
7:26-11.6(c)3	Is the thermal treatment inspected daily?			
7:26-11.6(e)	Is there open burning of hazardous waste?			
	If yes, what is being burned? (Only burning or detonation of explosives is permitted).			

		YES	NO	N/A
	If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?			N/A
7:26-11.7	Chemical, Physical and Biological Treatment			N/A
	(Other than in tanks, surface impoundments or plant treatment facilities).			
	Describe the treatment system at this facility and the types of wastes treated.			
7:26-11.7(a)2	Does the treatment process system show any signs or ruptures, leaks or corrosion?			
	If yes, describe.			
7:26-11.7(a)3	Is there a means to stop the inflow of continuously fed hazardous wastes?			
	Inspections			
7:26-11.7(c)1	Is the discharge control safety equipment (e.g., waste feed cut-off systems, bypass systems, drainage systems and pressure relief systems) in good working order?			
7:26-11.7(c)1	Are they inspected at least once each operation day?			
7:26-11.7(c)2	Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?			
7:26-11.7(c)2	Is data gathered at least once each operating day?			
7:26-11.7(c)3	Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?			
7:26-11.7(c)4	Are the discharge confinement structures (e.g., dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).			

		YES	NO	N/A
7:26-11.7(e)1	Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?			N/A
	If yes, explain how.			
7:26-11.7(f)	Are the incompatible wastes placed in the same treatment process?			
	If yes, please explain.			
7:14A-6	Ground Water Monitoring			N/A
	(Applies only to: Surface impoundments, landfills, land disposal facilities).			
7:14A-6.2	Does the owner/operator have a ground water monitoring plan approved by the department and capable of determining the facility's impact on the quality of ground water?			
	If no, please explain.			
	How many monitoring wells has the facility installed?			
	What is the depth to ground water?			
	How many deep monitoring wells are on site? (Indicate depth of monitoring wells).			
	How many shallow monitoring wells are on site? (Indicate depth of monitoring wells).			
7:14A-6.3(a)	Is the ground water monitoring system capable of yielding ground water samples for analysis?			
	If no, please explain.			
7:14A-6.3(a)1	Are monitoring wells installed hydraulically upgradient?			
	If yes, specify how many and the depth of each.			

		YES	NO	N/A
7:14A-6.3(a)2	How many monitoring wells are installed hydraulically downgradient?			
	If yes, specify how many and the depth of each.			
7:14A-6.4(a)	Does the owner/operator have a ground water sampling and analysis plan?			
	If no, please explain.			
7:14A-6.4(a)	Does the plan include procedures and techniques for:			
	1. Sample Collection			
	2. Sample Preservation and Shipment			
	3. Analytical Procedures			
	4. Chain of Custody			
	List the types and quantities of hazardous waste incinerated.			
7:26-9.4(b)3	Did the owner or operator submit the waste analysis plan to the Department?			
	If yes, when was the plan submitted?			

ACCOUNT NO: W01553

REPORT NUMBER : 39001609
REPORT DATE : 01/16/99

SAMPLE DATE : 12/27/98
SAMPLE TIME : 11:45AM
SAMPLE TEMP : NA F
SAMPLED BY : CU
COLLECTED BY : CU
ANALYSIS DATE : 12/28/98
P.O. NUMBER : 1740
PWS-ID NUMBER :

QC Inc

1205 INDUSTRIAL HIGHWAY • P.O. BOX 514
SOUTHAMPTON, PA. 18966 • 215/355-3900

NEW JERSEY RIVET COMPANY
1725 HADDON AVENUE
CAMDEN, N.J.
08103096

TEST NUMBER →	W0100-UNT	W0203-MGL	W0204-MGL	W0207-MGL	W0209-MGL	W0214-MGL	W0217-MGL	W0221-MGL	W0222-MGL	W0244-XXX	W0294-X
TEST NAME →	PH	ARSENIC	BARIUM	CADMIUM	CHROMIUM	LEAD	MERCURY	SELENIUM	SILVER	REACTIVIT*	TCLP EX
SAMPLE/CONTAINER UNIT MEASURE →	UNITS	MG/L	MG/L	MG/L	MG/L	MG/L	MG/L	MG/L	MG/L		
SLUDGE SAMPLE LEACHATE 760841 QC SUPPLIED CONTAINER	5.39	<0.05	0.057	1.9	0.46	<0.05	<0.001	<0.01	<0.05	NEG	

* REACTIVIT = REACTIVITY-EVOLVES HCN/H2S
* TCLP EXTR = TCLP EXTRACTION

SAMPLE# COMMENT NOTE: EACH SAMPLE ABOVE IS GIVEN A UNIQUE ID# (PRINTED JUST BELOW THE SAMPLE)
SAMPLED BY CUSTOMER
760841 ALL TESTING IS CONDUCTED IN ACCORDANCE WITH E.P.A. METHODOLOGY

Analysis on TCLP leachate from solids

Allen D. Schopbach

Allen D. Schopbach, President

> - Greater Than < - Less Than

ACCOUNT NO: M01553

REPORT NUMBER : 89
REPORT DATE : 01/

SAMPLE DATE : 12/
SAMPLE TIME : 11:
SAMPLE TEMP : NA
SAMPLED BY : CU
COLLECTED BY : CU
ANALYSIS DATE : 12/
P.O. NUMBER : 174
PWS-ID NUMBER :

QC Inc

1205 INDUSTRIAL HIGHWAY • P.O. BOX 514
SOUTHAMPTON, PA. 18966 • 215/355-3900

NEW JERSEY RIVET COMPANY
785 HANSON AVENUE
CAMDEN, N.J.
08103096

TEST NUMBER →	W0267-MGL	W0268-MG
TEST NAME →	REACT. CN	REACT. H2S
SAMPLE/CONTAINER UNIT MEASURE →	MG/L	MG/L
SLUDGE SAMPLE LEACHATE	1.4	12.
760841 QC SUPPLIED CONTAINER		

Total Sample

* REACT. CN = REACTIVE CYANIDE
* REACT.H2S = REACTIVE HYDROGEN SULFIDE

SAMPLE# COMMENT NOTE: EACH SAMPLE ABOVE IS GIVEN A UNIQUE ID# (PRINTED JUST BELOW THE SAMPLE)
SAMPLED BY CUSTOMER
760841 ALL TESTING IS CONDUCTED IN ACCORDANCE WITH E.P.A. METHODOLOGY.

Allen D. Schopbeck

Allen D. Schopbeck, President

P.02
JUN-19-89 11:26 FROM NJ RIVET

ACCOUNT NO: WD1553

REPORT NUMBER: 8900457
REPORT DATE: 02/03/89

SAMPLE DATE: 12/27/88
SAMPLE TIME: NA
SAMPLE TEMP: NA F
SAMPLED BY: CU
COLLECTED BY: CU
ANALYSIS DATE: 12/28/88
P.O. NUMBER:
PWS-ID NUMBER:

QC Inc
1205 INDUSTRIAL HIGHWAY • P.O. BOX 514
SOUTHAMPTON, PA. 18966 • 215/355-3900

NEW JERSEY RIVET COMPANY
1785 HADDON AVENUE
CAMDEN, N.J.
081033096

SAMPLE/CONTAINER	TEST NUMBER →	WD212-MGL	WD219-MGL	WD228-MGL
	TEST NAME →	COPPER	NICKEL	ZINC
	UNIT MEASURE →	MG/L	MG/L	MG/L
SLUDGE SAMPLE LEACHATE OF 12/27 772442 QC SUPPLIED CONTAINER		21.	180.	70.

SAMPLE# COMMENT NOTE: EACH SAMPLE ABOVE IS GIVEN A UNIQUE ID# (PRINTED JUST BELOW THE SAMPLE)
SAMPLED BY CUSTOMER
772442 ALL TESTING IS CONDUCTED IN ACCORDANCE WITH E.P.A. METHODOLOGY.

TCLP
Leachate from Solids in Sample.

Allen D. Schopbach

Allen D. Schopbach, President

> - Greater Than < - Less Than

12-188

(10) FOR JACK ALLEN

Inspector: Ben Wilbur
Address: NJDEP Southern Bureau
w E Clementon and Gibbsboro NJ 08026
Telephone No: (609)-346-8004

RCRA LAND DISPOSAL RESTRICTION
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

A. Handler Name: New Jersey Rivet Co.
B. Street (or other identifier): 1785 Haddon Ave
C. City: Camden
D. State: New Jersey
E. Zip Code: 08103
F. County Name: Camden
G. Nature of Business; Identification of Operations: SIC Code(s): Rivet manufacturer; nickel, cadmium, copper and zinc coating of rivets
H. EPA ID #: NJD 002324903
I. Handler Contact (Name and Phone Number): Mr. Dennis Van Nome (609) 963-2237

II. GENERATOR COMPLIANCE

Comments

A. Waste Identification

1. F-Solvents

a. Does the handler generate the following wastes?

(i) F001, F002, F004, or F005 ___Yes ✓No

(ii) F003 ___Yes ✓No

If an F003 wastestream (listed solely for ignitability) has been mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? ___Yes ___No

b. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Reports ___ other (specify) ___

Appendix A is intended to assist the inspector and enforcement official in determining whether the facility is generating F-solvent vastes, if such vastes were not identified by the facility previously. If you are concerned that F-solvent vastes may be misclassified or mislabeled, turn to Appendix A-1. To assist in identfying potentially

Handler Name: NJ Rivet
ID Number: NJD 002324803
Inspector: Burkelbury
Date: 6/9/89

Comments

misclassified F-solvents, Appendix A-2 presents a list of corresponding P and U wastes. Note concerns below: ______

______

2. Dioxin wastes

a. Does the handler report the generation of the following wastes? (The following industries may generate listed dioxin wastes: organic chemicals, pesticide or formulator.)

(i) F020 - F023, F026 - F027 __Yes ✓No
(ii) F028 __Yes ✓No

[F-solvent BDAT standards are presented as Appendix B]

3. California Waste Identification

a. Does the facility handle any of the following wastes?

(i) D002 __Yes ✓No
(ii) D004 - D011 ~~yes~~ D006 ✓Yes ~~✓~~No BW

D006 manifested off-site but results from treatment ~~of F006 waste~~ to Armond CEW generator treats cyanide from plating operations rinse on site. generates F006

b. Does the generator handle any hazardous wastes characterized by high concentrations of halogenated organic constituents (HOCs), metals, or cyanides? ✓Yes ~~✓~~No BW

[California waste standards are presented as Appendix C]

c. Is the generator handling any of the F, K, P, or U wastes subject to the "soft hammer" that may qualify as California wastes due to HOC, metals, or cyanide content? See Appendix D for a listing of California constituents likely to be found by waste code. __Yes ✓No

d. Has the generator conducted the paint filter test (Method 9095) [§268.32(i)]? __Yes ✓No*

NA - waste is liquid

e. Has the generator conducted any testing of these hazardous wastes to determine whether the concentrations qualify the hazardous wastes as California wastes? ✓Yes ~~✓~~No BW

recent shipment leachate analysis 1.9 ppm Cd, 180 ppm Ni ~~and~~ California lists

If no, has the generator retained records documenting his "applied knowledge" that the hazardous waste is not a California waste? ~~✓Yes~~ ~~✓~~No BW NA

*/ A potential violation is indicated

Handler Name: NS River
ID Number: NJD 002324903
Inspector: Hubbard
Date: 6/9/9

Comments

If "no" is answered to both parts of this question, a violation is indicated. [§268.7(a)]

Describe the nature of the records:

_____

f. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ___.

4. First Third Waste Identification

a. Does the generator handle any of the wastes listed as First Third Wastes in §268.10? See Appendix E for listing. List First Third Wastes handled by the generator here: NO

_____
_____
_____

b. Does the generator handle any soft-hammer wastes (Appendices D-1, D-2, and F)? If so, list those wastes: NO

_____
_____

c. Are any of the soft-hammered wastes California wastes (see Appendix G)? ___Yes ___No

If yes, the wastes must meet BDAT standards prior to disposal. N/A

d. Has the Regional Administrator received demonstrations/certifications for all soft hammered wastes to be land disposed [§268.8(a)(2)]? ___Yes ___No*

e. Source of the above: Form 8700-12 ___; Part A ___; Part B ___; Biennial/Annual Report ___; other (specify) ___.

B. BDAT Treatability Group - Treatment Standards Identification

1. Does the generator mix restricted wastes with different treatment standards for constituents of concern? ___Yes ✓No

2. If yes, did the generator select the most stringent treatment standard for the constituent of concern [§268.41(b)]? ___Yes ___No* N/A

*/ A potential violation is indicated

Handler Name: NJ Rivet
ID Number: NJD 002324903
Inspector: B Willom
Date: 6/9/89

Comments

3. F Solvents - -

   a. Did the generator correctly determine the appropriate treatability group [§268.41] of the waste (e.g., wastewaters containing solvents, nonwastewater (i.e., < 1% TOC), pharmaceutical wastewaters containing spent methylene chloride, all other spent solvent wastes)?
   ___Yes ___No*

not applicable

4. California Wastes

   a. Did the generator correctly determine the distinction between liquid hazardous wastes and non-liquid hazardous wastes that contain HOCs in concentrations greater than 1,000 mg/kg [§268.32(h)]?
   ___Yes ___No*

not applicable
No HOC's present

5. First Third Wastes

   a. Did the generator ascertain whether restricted wastes were appropriately assigned wastewater or nonwastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) [§268.7(a)]?
   ___Yes ___No*

   b. Does the facility handle K061 wastes?
   ___Yes ___No

   If yes, were nonwastewaters appropriately classified in either the high or low zinc subcategories (≥15% Zn) [§268.7(a)] [§268.41(a)]?
   ___Yes ___No*

N/A

   c. Does the facility handle K101 or K102 wastes?
   ___Yes ___No

   If yes, were nonwastewaters appropriately classified in either the high or low arsenic subcategories [§268.7(a)] [§268.41(a)]?
   ___Yes ___No*

N/A

   d. Is there any reason to believe that the generator may have diluted the waste to change the applicable treatment standard (based on review of process operation, pipe routing, point of sampling)?
   ___Yes ___No

*/ A potential violation is indicated

Handler Name: NJ Rivet
ID Number: NJD
Inspector: Bulthuis
Date: 6/19/89

Comments

C. Waste Analysis - -

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):

a. Knowledge of wastes (BW) ✓ Yes ✓ No

(i) List wastes for which "applied knowledge" was used:

b. TCLP ✓ Yes ___ No

(i) List wastes for which "TCLP" was used: F006 Sludge was analyzed.

(ii) Appendix D lists wastes for which treatment standards are expressed as concentrations in waste extract. Were any wastes handled by the generator subject to waste extract standards not tested using the TCLP? ___ Yes ✓ No

If yes, list:

c. Total waste analysis ___ Yes ___ No

d. If files were retained, describe content and basis of applied knowledge determination:

If determined by TCLP or total constituent analysis, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: 1-16 6 2/3/89 1st test for TCLP on leachate

Note which wastes were subjected to which tests: F006 soleds Sludge

Note any problems (e.g., inadequate analysis, variation of waste composition/generation for applied knowledge)

Inadequate analysis indicated 1.9 ppm Cd - not California listed
80 ppm Ni is California listed
All attached copy of analysis

✓/ A potential violation is indicated

Handler Name: NJ Rivet
ID Number: NJD 002324903
Inspector: Bylsma
Date: 6/9/89

Comments

e. Were wastes tested using TCLP or total constituent analysis when a process or wastestream changed [§264.13(a)(3)(i) or §265.13(a)(3)(i)]?
___Yes ✓No* — no change in process / stream

2. Did the restricted wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(1)]?

List those that exceeded standards: Nickel data was 180 mg/l Cd. St. is 134 mg/l. Treatment STD is .32 mg/l. Cd level was 1.2 mg/l STD is .066 mg/l.
Ni, Cd.

List those that did not exceed standards: _____
Cr.

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]
___Yes* ✓No

D. Management

1. Onsite management

a. Were restricted wastes managed onsite?
✓Yes ___No

If no, go to "2".

b. For wastes that exceed treatment standards, was treatment in regulated units, storage for greater than 90 days, and/or disposal conducted?
✓Yes ___No — >90 day storage, treatment by concentrate waste

If yes, TSDF checklist must be completed.

2. Offsite Management

a. If restricted wastes exceed treatment standards, did generator provide treatment facility notification with each shipment? [268.7(a)(1)]:

(i) EPA Hazardous Waste Number? ✓Yes ___No*

(ii) Corresponding treatment standard?
___Yes ✓No*

(iii) Manifest number? ✓Yes ___No*

(iv) Waste analysis, if available?
✓Yes ___No

no cal form last attachment for Nickel

*/ A potential violation is indicated

Handler Name: NJ Rim N
ID Number: NJD 002324903
Inspector: BMW
Date: 6/9/87

Comments

Identify offsite treatment facilities
Recent - Waste was sent to Shmetco, Elwood City Pa 16117
PAD 087561015

b. If restricted wastes do not exceed treatment standards, did generator provide the disposal facility with a notice and certification including: NR

(i) EPA hazardous waste I.D. number? ___Yes ___No*

(ii) Corresponding treatment standard? ___Yes ___No*

(iii) Manifest number ___Yes ___No*

(iii) Certification regarding waste and that it meets treatment standards? ___Yes ___No*

Identify land disposal facilities receiving the BDAT certified wastes _____

c. If the generator's waste is subject to a §268.5 case by case exemption, a §268.6 "no migration" exemption, or a nationwide variance (see Appendix E for restricted wastes subject to nationwide variances), does the generator's records indicate that he or she submits with each waste shipment [§268.7(a)(3)]: NR

(i) EPA Hazardous Waste Number? ___Yes ___No*

(ii) Corresponding Treatment Standards? ___Yes ___No*

(iii) All applicable prohibitions? ___Yes ___No*

(iv) The manifest number? ___Yes ___No*

(v) The date the wastes are subject to prohibitions? ___Yes ___No*

(vi) Does generator keep records of all notifications/certifications send to offsite facilities? ___Yes ___No*

*/ A potential violation is indicated

Handler Name: NJ Rivet
ID Number: NJD 001324903
Inspector: Walther
Date: 6/9/87

Comments

List all prohibited wastes for which records are not provided per above [§268.7(a)(b):

_____

_____

Identify TSDFs receiving any prohibited wastes subject to any exemptions and variances:

_____

_____

d. If handler generates a "soft hammer" waste, does the generator send with each "soft hammer" waste shipment to a TSDF and retain copies of, a notice that includes [268.7(a)(4)]: N/A

The EPA Hazardous Waste Number? ___Yes ___No*

Applicable prohibitions? ___Yes ___No*

The manifest number? ___Yes ___No*

Waste analysis data, where available? ___Yes ___No

(i) Do the generator's records indicate that any soft-hammer wastes are destined for disposed in a landfill or surface impoundment [§268.33(f)]? ___Yes ___No

If yes, list facility of destination and waste of concern [§268.8(a)(2)]

_____

_____

(ii) Has the generator submitted demonstrations and certifications for each "soft-hammered" waste destined to be disposed in landfill or surface impoundment to the Regional Administrator prior to the shipment of waste to the TSDF [§268.7(a)(2)]? ___Yes ___No*

(iii) Has the generator retained a copy of the demonstration on site [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(iv) Has the generator retained copies of all §268.8 certifications sent to the TSDF [§268.7(a)(6)] ___Yes ___No*

* A potential violation is indicated

Handler Name: NS River
ID Number: NJD002324903
Inspector: Bryan
Date: 6/9/89

Comments

(v) Did the generator submit the demonstration to the receiving facility upon the intial shipment of the waste [§268.8(a)(3)-(a)(4)]? ___Yes ___No*

(vi) If the Region 1 Administrator has invalidated the certification, has the generator ceased shipment of the waste and do records indicate that the generator has informed all receiving facilities of the invalidation [§268.8(b)(3)]? ___Yes ___No*

N/A

E. Storage of Prohibited Waste

1. Were prohibited wastes stored for greater than 90 days? ✓Yes ___No

If yes, was facility operating as a TSD under interim status or final permit [§262.34(b)]? ___Yes ✓No*

neither it to no permit Treat.

If yes, TSDF Checklist must be completed.

F. Treatment Using RCRA 264/265 Exempt Units or Processes (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, etc.)

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes? ___Yes ___No

If yes, list type of treatment unit and processes

_____

_____

_____

If yes, TSDF checklist must be completed.

* potential violation is indicated